

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application of Vale S.A., Vale Holdings
B.V., and Vale International S.A. for an Order
Pursuant to 28 U.S.C. § 1782 to Conduct
Discovery for Use in Foreign Proceedings.

Case No. 1:20-mc-00199(JGK)(OTW)

**JOINDER TO NYSCO MANAGEMENT CORPORATION'S OPPOSITION TO THE
APPLICATION OF VALE S.A., VALE HOLDINGS B.V., AND VALE
INTERNATIONAL S.A. FOR AN ORDER PURSUANT TO 28 U.S.C. § 1782 TO
CONDUCT DISCOVERY FOR USE IN FOREIGN PROCEEDINGS**

PLEASE TAKE NOTICE THAT RFR Holding LLC, RFR Realty LLC, R&S Chrysler LLC, and Aby Rosen (collectively, "RFR") join Nysco Management Corporation's ("Nysco") Opposition to the Application of Vale S.A., Vale Holdings B.V., and Vale International S.A. (collectively, "Vale") for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings. Following review of Nysco's Memorandum of Law and the supporting Declaration of Nicola Boulton, along with the exhibits attached thereto, it appears to RFR that the discovery Vale seeks is premature at best and the burden and expense associated with any response to the discovery requests would be avoided if Nysco's pending application for summary judgment in the foreign proceeding is granted.

Dated: New York, New York
June 10, 2020

MCDERMOTT WILL & EMERY LLP

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